

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

BP EXPLORATION & PRODUCTION, §	
INC., et al., §	
Paintiffs, §	CIVIL ACTION NO. 4:10-CV-01162
	<i>consolidated with</i> NO. 4:09-CV-03360
v. §	
NATIONAL OILWELL VARCO, L.P., §	
et al., §	HON. VANESSA GILMORE
Defendants. §	PRESIDING

**AGREED MOTION TO EXTEND DEADLINES AND
DEFER CONSIDERATION OF CERTAIN PENDING MOTIONS**

1.

The parties to this suit are engaged in settlement discussions and to facilitate those discussions, they jointly request that the Court delay certain deadlines and defer consideration of certain motions for a period until no sooner than November 8, 2008.

2.

BP filed an Opposed Motion for Leave to File An Amended Complaint on August 30, 2010 (Doc. 65). NOV filed their opposition to the motion on September 20, 2010 (Doc. 70) and BP filed a reply in support of the motion on September 22, 2010 (Doc. 74). The parties anticipate filing additional briefing on the matter since this issue is tied to the pending motion for partial summary judgment addressed above. The parties jointly request that the Court extend the due date for additional briefing on the motion until no sooner than November 8, 2010, and that the Court defer consideration of the motion until after such briefing has been filed.

3.

Defendants National Oilwell Varco, L.P., National Oilwell Varco, Inc., Hydralift Amclyde, Inc., and Hydralift, Inc. (collectively NOV) filed their Motion for Partial Summary Judgment on Counterclaim for Contractual Indemnity (Doc. 66) on September 3, 2010. Plaintiffs BP America Production Company, BP Exploration & Production, Inc, and American Home Assurance Company (collectively, BP) filed their opposition to the motion on Wednesday, September 22 (Doc. 73-2). NOV's reply is presently due on October 6, 2010. The parties jointly request that the Court extend the due date for additional briefing on the motion until no sooner than November 8, 2010, and that the Court defer consideration of the motion until after such briefing has been filed.

Respectfully submitted,

By: /s/ _____
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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of September, 2010, I electronically filed the foregoing document with the clerk of the court for the United States District Court, Southern District of Texas, using the electronic case filing system of the Court. The electronic case filing system will send a "Notice of Electronic Filing" to counsel of record who have consented in writing to accept this Notice as service of this document by electronic means; I further certify that I have served counsel of record who have not so consented to electronic service pursuant to the Federal Rules of Civil Procedure.

/s/ _____
Melissa M. Davis